

3. Venue is proper in this matter in the Columbia Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges she suffered great physical harm and injury; has undergone physical pain and suffering; has and will continue to expend large sums of money for medical treatment and services; has suffered trauma, anxiety, annoyance, whole body impairment; and inconvenience as a result of this incident. Attempts to contact Plaintiff's counsel to discuss the amount in controversy have been unsuccessful.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Richland County.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow

Mark S. Barrow, Federal ID No.: 1220

Ryan C. Holt, Federal ID No.; 10736

1515 Lady Street

Post Office Box 12129

Columbia, South Carolina 29211

(803) 256-2233

ATTORNEYS FOR THE DEFENDANT

Columbia, South Carolina

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